

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

PHILLIP WADE GRIMES, Personal
Representative of the Estate of O.P.G.,
deceased

Plaintiff,

v.

YOUNG LIFE, INC., and ADVENTURE
EXPERIENCES, INC.

Defendants.

Case No. 8:16-cv-27-SDM-EAJ

DEFENDANTS' AMENDED JOINT MOTION TO DISMISS, OR
IN THE ALTERNATIVE, TO TRANSFER

Defendant Young Life, Inc. and Defendant Adventure Experiences, Inc., by and through counsel and pursuant to Rule 12(b)(2), hereby move to dismiss all claims asserted against them by plaintiff Philip Wade Grimes, Personal Representative of the Estate of O.P.G., on the grounds that this Court lacks personal jurisdiction over defendants. In the alternative, Defendant Young Life, Inc. and Defendant Adventure Experiences, Inc., move to transfer this matter to the United States District Court for the District of South Carolina, Anderson Division pursuant to 28 U.S.C. 1406(a). In the further alternative, Defendant Young Life, Inc. and Defendant Adventure Experiences, Inc., move to transfer this matter to the United States District Court for the District of South Carolina, Anderson Division pursuant to 28 U.S.C. 1404(a).

In support of this motion, Defendant Young Life, Inc. and Defendant Adventure Experiences, Inc., rely upon their Memorandum in Support and the exhibits attached thereto.

Respectfully submitted this the 3rd day of February, 2016.

/s/ Cary A. Cash

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he is an attorney at law admitted to practice in the United States District Court for the Middle District of Florida, Tampa Division, is attorney for Defendant Young Life, Inc., and is a person of such age and discretion as to be competent to serve process.

That on February 3, 2016, he electronically filed the foregoing **DEFENDANTS' AMENDED JOINT MOTION TO DISMISS, OR IN THE ALTERNATIVE, TO TRANSFER** with the Clerk of Court for the United States District Court for the Middle District of Florida, Tampa Division, by using the CM/ECF system which served a copy on the following parties or their counsel of record:

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